

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**Cung Le, Nathan Quarry, Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and
Kyle Kingsbury, on behalf of themselves and
all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF RICHARD A.
KOFFMAN, ESQ., IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
SPARACINO PLLC'S MOTION FOR
RELIEF PURSUANT TO THE COURT'S
INHERENT AUTHORITY**

I, Richard A. Koffman, Esq., declare and state as follows:

1. I am a Partner in the law firm of Cohen Milstein Sellers & Toll, PLLC, one of the Court-appointed Interim Co-Lead Counsel for the certified Bout Class. I am a member in good standing of the District of Columbia Bar and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

2. I make this Declaration in support of Plaintiffs' Opposition to Sparacino PLLC's Motion for Relief Pursuant to the Court's Inherent Authority.

3. Attached as Exhibit 1 is a true and correct copy of a solicitation letter sent on or about March 16, 2021 from Ryan R. Sparacino of Sparacino PLLC to former UFC fighter and Bout Class

member Sean Sherk.

4. Attached as Exhibit 2 is a true and correct copy of a brochure included with the March 16, 2021 letter attached as Exhibit 1. The brochure contains several images (*see* Exhibit 2 at 7-9) pulled directly from Plaintiffs' Consolidated Amended Antitrust Class Action Complaint in this case. *See* ECF No. 208, at 6, 8.

5. Attached as Exhibit 3 is a true and correct copy of a Declaration of Professor Jeffrey W. Stempel, dated September 26, 2023.

6. Attached as Exhibit 4 is a true and correct copy of a second solicitation letter sent on or about March 24, 2021 from Ryan R. Sparacino of Sparacino PLLC to former UFC fighter and Bout Class member Sean Sherk.

7. Attached as Exhibit 5 is a true and correct copy of a Declaration of former UFC fighter and Bout Class member Antonio McKee.

8. Attached as Exhibit 6 is a true and correct copy of several posts from Ryan R. Sparacino's LinkedIn account.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 27th day of September, 2023, in Rockville, MD.

/s/ Richard A. Koffman